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20 UNITED STATES DISTRICT COURT
21 CENTRAL DISTRICT OF CALIFORNIA

22 Federal Trade Commission,
23 Plaintiff,
24 v.
25 Jason Cardiff, et al.,
26 Defendants.

FILED UNDER SEAL

27 **CV 18-2104** - JGB(kkx)
28 Case No. _____

FTC'S EXHIBITS IN SUPPORT
OF ITS *EX PARTE* APPLICATION
FOR TEMPORARY
RESTRAINING ORDER

PX-10
DECLARATION OF STACIE A.
BOSLEY, PH.D.



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22 **FEDERAL TRADE COMMISSION,**

23 Plaintiff,

24 v.

25 **JASON CARDIFF, et al.,**

26 Defendants.

Case No. _____


**DECLARATION OF STACIE A.
BOSLEY, PH.D.**

27 I, Stacie A. Bosley, Ph.D., submit this declaration in support of Plaintiff
28 Federal Trade Commission's ("FTC") Ex Parte Application For Temporary
Restraining Order. The following statements are within my personal knowledge or
my expertise.

1. I am an associate professor of economics at Hamline University in Saint Paul, Minnesota. I hold a Ph.D. in Applied Economics and a BBA in Finance.

2. The staff of the Federal Trade Commission asked me to analyze the Rengalife multilevel marketing program to determine whether Redwood Scientific Technologies, Inc. was misrepresenting the Rengalife program with misleading or false earnings claims. I prepared an expert report detailing my conclusions. Attached to this Declaration is a true and correct copy of that report.

I declare under penalty of perjury that the foregoing is true and correct.
Executed on September 21, 2018, in Saint Paul Minnesota.


Stacie A. Bosley, Ph.D.

Expert Report - Stacie A. Bosley, Ph.D.

Case Information

1. This report was written at the request of the Federal Trade Commission (FTC) regarding FTC Matter No. 1723117 and addresses the business activities of Redwood Scientific Technologies, Inc. and the Rengalife business opportunity.

Expert Qualifications

2. My name is Dr. Stacie A. Bosley. I have a doctoral degree in Applied Economics from the University of Minnesota. In my capacity as an associate professor of economics at Hamline University, I research multi-level marketing, direct selling and pyramid schemes. I have written multiple academic papers on these topics, ranging from an analysis of direct selling around the world to an examination of the relationship between domestic economic conditions and multi-level marketing activity. I published a 2015 paper in the *Journal of Public Policy and Marketing*¹ that addresses the intersection of multi-level marketing and pyramid scheme activity as well as a 2018 paper in the *Journal of Financial Crime* that analyzes community-level risk factors associated with pyramid scheme victimization.² I have also presented research on these topics at numerous economics conferences around the country. My most recent research projects use economic experiments to explore pyramid scheme victimization and individual risk factors, as well as information disclosure and consumer earnings expectations in multi-level marketing. Beyond academic research, I have served as an expert witness for the Federal Trade Commission in *FTC v. Vemma Nutrition Company*, Case 2:15-cv-01578-JJT, submitting multiple written declarations and testifying in a 2016 preliminary injunction hearing. I am also serving as an expert witness in *Aboltin v. Jeunesse LLC, et al.*, Case 6:17-cv-1624-Orl-40KRS, in United States District Court for the Southern District of Florida. I have been interviewed by media outlets and have participated in national conversations

¹ Bosley, S. & McKeage, K. (2015). Multilevel Marketing Diffusion and the Risk of Pyramid Scheme Activity: The Case of Fortune Hi-Tech Marketing in Montana. *Journal of Public Policy & Marketing*, 34(1), 84-102.

² Bosley, S. & Knorr, M. (2018). Pyramids, Ponzis, and fraud prevention: Lessons from a case study. *Journal of Financial Crime*, 25(1), 81-94.

on multi-level marketing and associated policy and regulation. With respect to specific federal legislation and regulatory rule changes, I have submitted formal comments and published a 2017 opinion piece.³

3. My university teaching focuses on microeconomics, quantitative analysis, managerial economics and behavioral economics. Each of these areas is relevant to the analysis presented in this report. Microeconomics is the study of individual decision-making and responses to incentives. Behavioral economics examines decision-making with a special focus on cognitive biases and errors in judgment. Quantitative analysis provides a background in analytical approaches to understanding data and patterns. Lastly, managerial economics studies decision-making inside businesses and organizations. An understanding of the actions of the firm (e.g., in setting compensation policies and procedures) and the actions of the individual (e.g., in joining and participating in a business opportunity) are highly relevant to the analysis that follows. A true and correct copy of my curriculum vitae is attached as Appendix A.

Purpose and Materials

4. The purpose of this report is to analyze the Rengalife marketing program to determine whether the company is misrepresenting the Rengalife program with misleading or false earnings claims. For the purposes of this report, analysis is primarily focused on March and April of 2018, which includes the pre-launch, launch and immediate post-launch period of the Rengalife marketing program. My report uses the present tense to discuss the materials that were available to me at that time. The Sections that follow set forth my analysis and include: 1) a statement of the conceptual framework and summary findings; 2) an overview of the Rengalife marketing program and compensation system; 3) a review of Distributor training and purchase incentives; 4) an analysis of the Rengalife structure and associated income

³ See Bosley, S. (September 29, 2017). Flawed Anti-Pyramid Act Reflects Confusion Over Past and Present. *Morning Consult*. available at <https://morningconsult.com/opinions/flawed-anti-pyramid-act-reflects-confusion-past-present/> and Bosley, S. (2013). Comments Regarding the Federal Trade Commission's Rule Concerning Cooling-Off Period for Sales Made at Homes or at Certain Other Locations, Project Number P087109.

representations; 5) a discussion of safeguards; and 6) report conclusions. My compensation for this engagement is \$160 per hour.

5. As this report represents an assessment of available materials, the opinions herein are based upon materials made available by Federal Trade Commission staff and materials available to the public, specifically Rengalife.com website content and Rengalife videos on YouTube and Facebook. A complete listing of reviewed materials is provided in Appendix B. These materials include documents or audio-visual files available to Rengalife Distributors or recruits, including the firm's Distributor Agreement, Policies & Procedures, and Terms & Conditions as well as training and marketing materials.

Conceptual Framework and Summary of Findings

6. For purposes of my economic analysis of the Rengalife marketing program and associated earnings claims, I will consider the structure of the Rengalife program as it relates to the economic characterization of a pyramid scheme.⁴ As will be discussed, the earnings claims can only be understood in conjunction with the program's pyramid scheme structure.

7. From an economic perspective, a pyramid scheme exists when a Compensation Plan is structured to create a perpetual recruitment chain that dooms the vast majority of participants to financial loss. It requires ongoing recruitment as new entrants must recruit others in order to cover their own personal investment. When a new participant recruits others, all individuals who join become part of her "downline," while those above her are considered her "upline." Downline activity (recruitment and associated payments/purchases) is needed in order to cover participation costs and potentially achieve advertised earnings. While the Compensation Plan details may vary, the essence of the system is that earnings are dependent on the ongoing ability to recruit others into the same system. By design, this creates a system where the vast majority of participants cannot recoup their personal investment. As long as recruitment continues, membership grows at an

⁴ The definitions used in this report are adapted from the definitions in a peer-reviewed article by William Keep and Peter Vander Nat (Keep, W. & Vander Nat, P. (2014). Multilevel marketing and pyramid schemes in the United States: An historical analysis. *Journal of Historical Research in Marketing*, 6(2), 188-210).

exponential rate. At any moment in time, the most recent entrants make up the vast majority of membership. This majority is the very group that is in a position of financial loss, as they have not acquired the downline recruits necessary to offset personal investments. By nature of the structure itself, a pyramid scheme is a money-transfer scheme that siphons money from later entrants to compensate earlier entrants, delivering easily foreseen losses (from a structural perspective) to the vast majority of participants.

8. It should be noted that the outcomes of exponential growth and widespread losses, articulated above, are expected at any point in time and do not require that the firm has reached market saturation. As demonstrated in my analysis of Rengalife's Compensation Plan, the percentage of participants in the lowest levels of the organization will constitute the majority of participants at any moment the scheme is analyzed. The analysis will show that loss rates are not accidental and can be anticipated given the recruitment incentives inherent in the Compensation Plan. As the promised rewards are realized only if successful recruitment continues indefinitely, positive earnings suggestions are false as they cannot be fulfilled for the overwhelming majority of participants. The absolute number of people who will ultimately be harmed (left in a loss position) grows exponentially as the organization expands. Many participants will exit when recruitment becomes more difficult. New recruits then take the place of the recent dropouts, creating a churning base. Most in the churning base will lose money while a few advance to higher levels of the organization. The vast majority of overall participants are not expected to earn enough to cover their personal investment.

9. A pyramid scheme can take a relatively simple form (e.g., gifting scheme or chain email/letter solicitation), offering explicit payments for recruitment of new members. A pyramid scheme can also be presented as a business opportunity that offers a product or service for sale. In this case, the pyramid scheme is presented as a direct selling opportunity where participants make payments that entitle them to earn based on subsequent sales and recruitment, either direct (sales or recruitment by the participant him/herself) or indirect (sales or recruitment by those in his/her downline). Such structures are commonly known as network marketing or multi-level marketing (MLM) programs. When a pyramid scheme is structured as a multi-level marketing opportunity, payments for recruitment may be explicit but are more often disguised as compensation tied to purchase volume. When Distributors are incentivized, trained and/or required to make personal

purchases and upline member compensation is tied to those Distributor purchases, this compensation acts as payment for recruitment. This connection will be discussed further in the Distributor Training and Incentivized Purchases section.

10. As will be shown (*infra*), the Rengalife program focuses its training, advancement, and earnings on the recruitment of new Rengalife Distributors. While it is theoretically possible to sell Rengalife products to those outside the Rengalife Distributor network and earn a profit for doing so – assuming that the product can be sold for a price exceeding the distributor’s cost – the rewards for doing so are so dwarfed by recruitment-based rewards as to be effectively meaningless in the context of the plan as a whole. Training and marketing materials consistently instruct potential and current Distributors to focus entirely on the recruitment of new Rengalife Distributors and claim guaranteed minimum income levels for meeting recruitment targets. Projected income is generated entirely by purchases made by Distributors themselves. Given the degree of focus on recruitment, I find that the Rengalife program is effectively an endless chain offer, where products are purchased merely as a way to participate in the payoff structure. As will be discussed in the Compensation Plan Analysis & Income Representations section, Rengalife’s earnings claims are inherently misleading given the fraudulent structure of the marketing program. I will briefly discuss the superficial safeguards that appear in the company’s Policies & Procedures and Terms & Conditions, though they do not alter my conclusions in any way. The Rengalife marketing program, along with the associated earnings claims and training, misleads consumers into a fraudulent operation that will ultimately deliver losses to the vast majority of participants.

Marketing Program and Compensation Overview

11. In association with Redwood Scientific Technologies, Inc., Rengalife offers products through a multi-level marketing distribution structure.⁵ In this

⁵ Though Jason Cardiff explicitly rejects the MLM term and prefers to refer to the Rengalife compensation system as “Multiple Streams of Income” or “MSI” (FB Live Video 03.28.18), the structure matches a conventional multi-level marketing (MLM) structure with the potential for rewards from personal

structure, participants can purchase products or sign on to become a product Distributor. The products sold through Rengalife are all said to utilize “oral thin film delivery strip” technology, with various consumer product applications such as weight loss and smoking cessation. Figure 1 shows the array of products offered through Rengalife Distributors. On the Rengalife.com website (also on 2018.03.19 Our Story FB), co-founders Jason and Eunjung Cardiff describe their motivation for creating Rengalife: “to create technology proof products and an easy to use system that allows for personal financial freedom and the ability to indulge in lifestyle luxuries,” offering a simple, rewarding compensation plan that “empowers people to reach their full potential – no matter their age, race, rank, income or education,” providing an “opportunity of a lifetime” (Website 2018.04.19 – Company). Rengalife is also described as a way to achieve success in concert with others: “At RENGALIFE, we believe there is a unique strength that only comes when we join hands with our members. The concept of ‘one being, or ‘family togetherness’, binds us and generates power to create profound change in ourselves, our families, and our community. Together, we reach a bigger, better, greater destination.” (Website 2018.04.19 – Join Now).

Figure 1: Products offered by Rengalife (Website 2018.04.19 – Company)

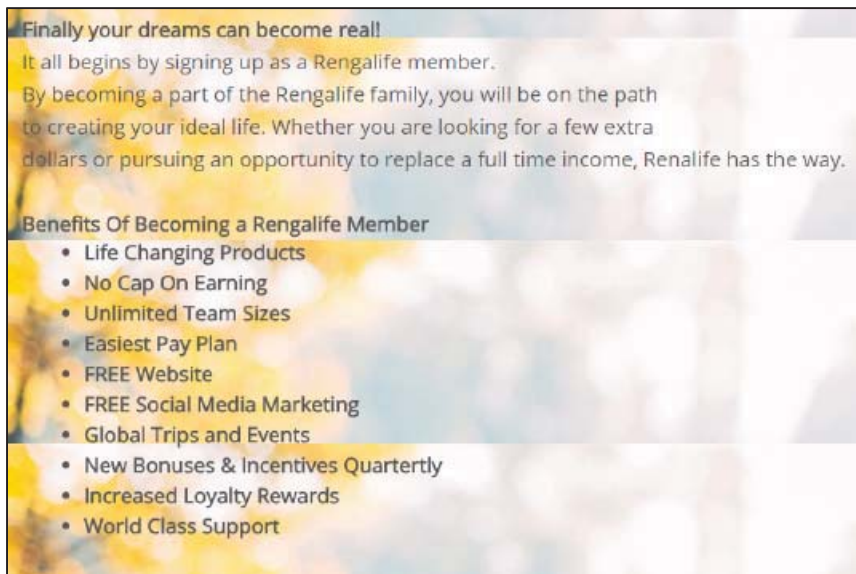


purchases, personal sales, and the sales and purchases of downline recruits. I will discuss MSI further in paragraph 17.

12. The Rengalife business opportunity is promoted as an easy pathway to a better life, with messages such as “Don’t just make a living, live the Rengalife,” “Work at your pace,” “Easy to get started,” “Business without the startup pains”, and “Are you ready to change your life?” under the Join Now menu (Website 2018.04.19 – Join Now). While a more detailed discussion of earnings representations can be found in the Compensation Plan Analysis & Income Representations section (*infra*), the Join Now website materials reference the income potential associated with the Rengalife opportunity. Figure 2 presents an example of Rengalife’s website language, promoting “No Cap on Earning” and “a few extra dollars” or enough to “replace a full time income.” Also within this section of the website is the following statement:

“Imagine your friend told you about a simple way to create financial freedom each month, would you listen? It’s no secret that people are facing tough economic times. From juggling medical bills to losing a job to buying a new home, budgets can become tight. Rengalife is here to help! The Rengalife platform will provide the necessary tools to help you thrive because with Rengalife you’re going to live a great life.”

Figure 2: Benefits of Becoming a Rengalife Member (Website 2018.04.19 – Join Now)



13. The Rengalife.com website offers three options to engage with Rengalife: join as a Customer, a Junior Executive, or as an Executive. A Customer can buy

products at the full retail price with no possibility of income, whereas a Junior Executive can earn money on products sold to retail customers (up to 20 percent retail profit depending on the difference between the Junior Executive's price and the final sales price to the consumer). A recruit can also join as an Executive to access product discounts and five ways to earn income. Figure 3 shows the Customer and Executive options, as presented on the Rengalife website. While the Junior Executive option is not shown in Figure 3, more information on this option is available on the website under "Financial Rewards" and in Facebook Live videos. The website and videos state that Junior Executives have no purchase requirement but have limited access to income and incentives. Within the description of Junior Executive on the company's website, it states: "It is encouraged to become an Executive to develop leaders and grow your own business as well as have access to all 5 Ways to Earn" and states "zero Override on sales team" immediately next to the "Jr. Executive" title (Website 2018.04.19 – Financial Rewards, also see Figure 4a below). Mr. Cardiff also actively discourages people from taking the Junior Executive path in multiple Facebook Live videos, saying: "you do not get to build a team, you do *not* get to build a team. You do not qualify for trips, you do not qualify for bonuses, you do not qualify for one-time bonuses, expansion bonuses, product bonuses, any additional pay bonuses that we put out there" (FB Live Video 03.26.18) and calls Executive the "best way" to join (FB Live Video 04.04.18). As will be discussed in the Safeguards section (*infra*), it appears that the Junior Executive option is a superficial attempt to comply with regulatory expectations.

Figure 3: Ways to Join (<http://www.rengalife.com/choosecustomertype/>)

Shop As A Customer	Executive Level
Access to special value bundles	FREE enrollment
Eligible for Automatic Orders	Turnkey business with global distribution
90 Day Money Back Guarantee	Unlimited free premium business tools and training
World class customer support	Earn income via commissions, bonuses and incentives
Not eligible to build a team	Part of easy bonus system
Not eligible for incentives or bonuses	Earn 30% commission on your direct team
	Commissions paid weekly
	20% discount off retail pricing
	Earn up to 20% on referral sales that shop and buy from you
	Access to five ways to earn
	Build your team as large as you like
	Access to special value bundles
	Eligible for automatic orders
	90 day money back guarantee
	World class customer support

14. Mr. Cardiff describes a fourth way to enter Rengalife in multiple Facebook Live videos (FB Live Videos 3.12.18 through 3.31.18) – by claiming a “direct partner” position, also called a “Founder’s Seat.” The specific terms of accessing a “Founder’s Seat” are unclear, but Mr. Cardiff suggests that only 500 such positions are available, and only for a limited time. Each Founder is said to have direct access to corporate support and is placed directly underneath the company rather than being placed under another Rengalife Distributor. These individuals also get lifetime front row seating at events, invitations to all incentive trips, and have direct access to the executive team. Cardiff also promotes this early-entry path by suggesting that those who enter first make the most money: “they do exponentially greater and better than somebody that gets in say a year later or six months later, or two years later” (FB Live Video 03.28.18). Whether beginning in a Founder’s Seat or not, each member can progress through the four primary levels of the organization: Executive, Director, Vice President, and Senior Vice President. Table 1 provides a summary of the possible ways to engage and progress within Rengalife, along with qualification requirements and associated sources of income, and Figure 4 provides associated website images. The five ways to earn income, available to Executives and above, are (Website 2018.04.19 – Financial Rewards):

- PTC (Personal Team Commission): 30% commission on product volume associated with all 1st level participants (i.e., volume associated with the personal purchases and Customer sales made by direct recruits); 10% commission on all volume associated with 2nd level participants (i.e., personal purchases and the Customer sales of those recruited by 1st level participants); and 5% commission on all volume associated with 3rd level participants (i.e., those recruited by 2nd level participants);
- PID (Product Introduction and Distribution): 20% commission on products sold to Customers through personal website;
- PTB (Product One-time Bonus): 10% commission for 60 days after a new product introduction;
- TRT (Travel and Reflection Time): travel bonuses, which vary by level; and
- PTM (Personal Title Movement): one-time bonus payments after progressing to a new level; \$500 for progression to Director, \$1200 for progression to Vice President; and \$10,000 for progression to Senior Vice President.

Table 1: Rengalife Levels and Qualification Requirements

Level	Customer	Junior Executive	Executive	Director	Vice President	Senior Vice President
Qualification Requirement	None	None	Purchase \$199.80 in products monthly (including at time of joining)	Purchase \$199.80 in products monthly; 10 Level 1 Executives	Purchase \$199.80 in products monthly; 10 Level 1 Directors (100 downline Executives or more)	Purchase \$199.80 in products monthly; 10 Level 1 Vice Presidents (1,000 downline Executives or more)
Rewards	None, buy product at retail	PID	PID, PTC, PTB, TRT, PTM	PID, PTC, PTB, TRT, PTM	PID, PTC, PTB, TRT, PTM	PID, PTC, PTB, TRT, PTM

15. All rank/level advancements are based on a pay-recruit ten–duplicate model, meaning that each participant will meet minimum monthly purchase requirements, recruit ten people who will do the same, and teach those ten frontline recruits to repeat the process. In the “Rengalife – 5 Ways to Earn” video, available on YouTube and found on the Rengalife.com website, Mr. Cardiff comments on the appeal of lifestyle and financial rewards and the primacy of recruitment. Cardiff states: “We know that a Rengalife member want to travel and see the world, they want to make money, and they also want to make their own way, make as little money or as much money and put your time into where you want to go in life.” He continues: “We make it really, really simple. You want to build your team underneath you and teach them how to build their team, but we will give you all of the tools to do that.” Cardiff states that team-commissions (PTC) are the most important source of income, next is level advancement bonuses (PTM), the third is trip incentives (TRT), “all expenses paid,” the fourth is bonuses for newly introduced products (PTB), and the last way to earn is by making product sales (PID). Mr. Cardiff describes the compensation plan as “simple, transparent and honest.” All website images in Figure 4 emphasize the team of 10 and team commission rates.

Figure 4: Commissions and Rewards (Website 2018.04.19 – Financial Rewards)

(a) Junior Executive


Jr. Executive (zero Override on sales team)

As a Jr. Executive you can sell products and receive 20% commission on your sales. You are not eligible for any team commissions, Rengalife trips and/or one-time product bonus. It is encouraged to become an Executive to develop leaders and grow your own business as well as have access to all 5 Ways to Earn.

PID- Product Introduction and Distribution
20% commission on all product sales that you sell, you will receive your own store page

(b) Executive

Executive



As an Executive, you have qualified with your minimum monthly spend of \$199.80 and now have access to all 5 Ways to Earn.

PTC- Personal team commission
30% on all your team's spending and sales
10% on the team below spending and sales
5% on the team below spending and sales

PID- Product introduction and distribution
20% commission on all product sales that you sell, you will receive your own store page.

PTB- Product onetime bonus
Receive 10% commissions for 60 days after the launch of any new Rengalife product.

TRT- Travel and Reflection Time
Rengalife offers many levels of travel and trips to reward sales and distribution.

PTM- Personal Title Movement
An Executive is recognized when an advancement takes place from Executive to Director. This occurs when the Executive signs up its first 10 Executives. This is a one-time only \$500.00 bonus.




Figure 4: Commissions and Rewards (Website 2018.04.19 – Financial Rewards)

(c) Director

Director (Minimum monthly Paid commission \$600.00)

As a Director, you have qualified with your minimum monthly spend of \$199.80 each month and you have access to all 5 Ways to Earn.

PTC- Personal team commission
30% on all your team's spending and sales
10% on the team below spending and sales
5% on the team below spending and sales

PID- Product introduction and distribution
20% commission on all product sales that you sell on top of PTC this is true distribution and we will design your look alike web site, free.

PTB- Product onetime bonus
These bonus are additional 10% commission for 60 days after the launch of any new Renga-life products.

TRT- Travel and Reflection Time
Renga-life offers many levels of travel and trips to incentive sales and distribution.

PTM- Personal Title Movement
PTMS for Director are recognized when you change title from Director to Vice President This happens when the Director signs up its first 10 teams members at the Director level and the PTM is a one-time only \$1,200.00 Bonus.



```
graph TD
    R1[Renga 1] -- 30% --> R2[Renga 2]
    R1 -- 30% --> R3[Renga 3]
    R2 -- 10% --> R4[Renga 4]
    R2 -- 10% --> R5[Renga 5]
    R3 -- 10% --> R4
    R3 -- 10% --> R5
    R4 -- 5% --> R6[Renga 6]
    R5 -- 5% --> R6
```

```
graph TD
    D[Director] --- T1[Team Member]
    D --- T2[Team Member]
    D --- T3[Team Member]
    D --- T4[Team Member]
    D --- T5[Team Member]
    D --- T6[Team Member]
    D --- T7[Team Member]
    D --- T8[Team Member]
    D --- T9[Team Member]
    D --- T10[Team Member]
```

(d) Vice President

Vice President (Minimum monthly paid commission \$2,600)

As a Vice President, you have qualified you have qualified with your minimum monthly spend of \$199.80 and now have access to all 5 Ways to Earn.

PTC- Personal team commission
30% on all your team's spending and sales
10% on the team below spending and sales
5% on the team below spending and sales

PID- Product introduction and distribution
20% commission on all product sales that you sell, you will receive your own store page.

TRT- Travel and Reflection Time
Rengalife offers many levels of travel and trips to incentive sales and distribution.

PTM- Personal Title Movement
As a Vice President when an advancement takes place from Vice President to Sr. Vice President. This occurs when the Executive signs up its first 10 Vice Presidents This is a one-time only \$10,000 bonus.



```
graph TD
    R1[Renga 1] -- 30% --> R2[Renga 2]
    R1 -- 30% --> R3[Renga 3]
    R2 -- 10% --> R4[Renga 4]
    R2 -- 10% --> R5[Renga 5]
    R3 -- 10% --> R4
    R3 -- 10% --> R5
```

```
graph TD
    VP[Vice President] --- T1[Team Member]
    VP --- T2[Team Member]
    VP --- T3[Team Member]
    VP --- T4[Team Member]
    VP --- T5[Team Member]
    VP --- T6[Team Member]
    VP --- T7[Team Member]
    VP --- T8[Team Member]
    VP --- T9[Team Member]
    VP --- T10[Team Member]
```

Figure 4: Commissions and Rewards (Website 2018.04.19 – Financial Rewards)

(e) Senior Vice President



16. Minutes before the Rengalife launch, Mr. Cardiff (FB Live Video 03.21.18) discussed the income potential of the Rengalife opportunity and the reasons to participate: "If you're looking to make, I don't know, maybe it's \$1500 a month, maybe it's \$10,000 a month but if you're looking to really unlock the secret of financial freedom as well as a very high quality of life, not just from a health standpoint but from an overall standpoint." Beyond somewhat vague financial and lifestyle claims, Rengalife promotional materials and videos include very specific discussion of minimum income levels one can "lock in" (discussed further in the Compensation Plan Analysis & Income Representation section). Figure 4 images include minimum income amounts: \$600 per month for Directors; \$2,600 per month for Vice Presidents; and \$12,600 per month for Senior Vice Presidents. In Rengalife – New Levels (<https://www.youtube.com/watch?v=DwaAZ6EBG30>), Cardiff progresses from vague to specific earnings claims within his appeals to potential recruits. He begins by stating that the pay-recruit ten-duplicate system allows you to

teach “somebody how they can free themselves of their job, their boss, their 9 to 5, set their own pace” and “pay it forward.” He then proceeds to discuss the minimum income levels associated with each rank in the organization: if you teach 10 people to move from Executive to Director, it “locks in your annual salary at a minimum, a very minimum of \$7,200 a year”; when you move to Vice President, “everybody on your level that you’ve got of your ten people has signed up ten people” and you “lock in your annual income at a minimum of over \$30,000”; finally, when you have “filled up your first level, your second level, your third level, you’ve locked in your income at \$144,000 a year,” and you earn three weeks of first class travel, and become part of the “inner circle” and a “true Rengalife leader.” In the same video, Mr. Cardiff instructs that you simply begin by “coming up with your first list of ten and going from there.”

17. In multiple videos, Mr. Cardiff explains that PTC (Personal Team Commission), the “direct commission off of building your team,” is not only the most important source of revenue but it also represents a “reoccurring revenue stream” (FB Live Video 3.23.18, 04.04.18). He describes PTC as “the big one” and “big money,” the most important part of the Rengalife promise of “Multiple Streams of Income” or MSI (FB Live Video 03.21.18-2). Cardiff suggests that MSI is the “core secret” that separates Rengalife from its competitors, and that MSI can also stand for “M=Money, S=Safety, and I=Insurance.” In this March 21, 2018 video, Cardiff explains MSI and the core focus on team commissions that provide a long-lasting income stream: “With a team, you build yourself, you get to build for yourself for the first time, you build re-occurring revenue. Now re-occurring revenue is revenue where you sleep at night, and you continually make money without doing anything new.” Note that these claims of residual income are predicated on assumptions of continued recruitment success and sustained monthly purchases by all participating Distributors.

18. Beyond financial rewards, Rengalife materials and videos discuss possibilities for leisure and “lifestyle rewards.” Distributors can qualify for vacations in “exotic destinations” with “one-of-a-kind accommodations” (Website 2018.04.19 – Lifestyle Rewards). Executives qualify for a five-day, two-person trip, Vice Presidents qualify for “5-star diamond travel” once a year, and Senior Vice Presidents qualify for three one-week vacations for four people. Recruits are asked: “Ready to start living your dreams with Lifestyle Rewards?” Figure 5 is an example of website language discussing Rengalife lifestyle rewards. In a Facebook Live video, Mr. Cardiff summarizes the travel benefits available to Distributors who rise above the Executive level (FB Live

03.14.18): “Everybody is going to get to go somewhere once you make it past the first little baby step, baby level, everybody is going to get to go somewhere once a year, and some people are going to get to go bucket-list places three times a year.”

Figure 5: Lifestyle Rewards (Website 2018.04.19 – Lifestyle Rewards)



GET THE PASSPORT STAMPS WORTH BRAGGING ABOUT.
Rengalife Distributors are filled with a vitality and a zest for life that allows them to live life to its fullest potential. Our Lifestyle Rewards trips are all about helping you truly live the Rengalife Lifestyle, which is driven by our motto:

LOOK YOUNG. FEEL YOUNG. LIVE YOUNG.
At Rengalife we know the benefits of being an entrepreneur include the freedom to:

- Indulge in opportunities outside the traditional 9-to-5 job
- Explore the world beyond our backyard
- Discover new memories with loved ones and colleagues

Each year, we reward Rengalife Distributors who have met certain impressive qualifications through their business building efforts with the chance to experience that freedom on the trip of a lifetime. Held in renowned and **exotic destinations**, our luxurious Lifestyle Rewards trips feature **one-of-a-kind accommodations** and a variety of activities to explore the locale with their fellow Distributors and families alike. Amid these activities, guests are exposed to the Rengalife Lifestyle through unique and exclusive brand and destination experiences.



19. The Rengalife rewards are said to be possible because the company combines social media marketing with “technology-proof products” (FB Live Videos from 03.10.18, 03.12.18, and 03.14.18). Mr. Cardiff and his associate, Bobby Bedi, explain the opportunity in a pre-launch video (excerpts from FB Live Video 03.09.18):

Bedi: “We’re going to show the world how to make some money.”

Cardiff: “And the future is this, is social media marketing but having products to go with it, and be able to build your own business, and have freedom, have success, ... but also, ...you don’t want to work for somebody else. You want to work for yourself, you want to set your own pace. Some people want to be a millionaire, some people just want to make \$50 or \$60 thousand, \$70 thousand a year, but they don’t want to work for someone else’s business.”

Bedi: “In this life, you can create your own hours.” “If you are happy making a hundred grand, you are happy making a hundred grand. If you want to reach the next level and go a million, hey, nobody’s stopping you.”

Cardiff: "In the Rengalife, living is about family, it's about family values, it's about spending more time enjoying yourself than working, but it also has to make sense and be simple, so it was designed for everybody." "Made it very simple. Pay plans that make sense, trips that make sense, incentives that make sense. You don't have to be a rocket scientist." "Anybody can do it, and if anybody can do it, that's when you're going to have success."

20. In his videos, Mr. Cardiff frequently discusses the changing nature of industry and the people and jobs that will be left behind. He suggests that the educational system has failed them and that he will teach them "all the things they didn't teach us in school that they should have," because, in the K-12 system, you are "not learning anything you need for the real world" (FB Live Video 04.04.18). Mr. Cardiff also appeals to the desire for advancement, status and autonomy. In a Facebook Live video on March 10, 2018 he discusses the limits of traditional employment, the possibilities with Rengalife, and the company's system of success:

"If you are working for somebody else in this world you're only going to get so far. I mean, how far are you going to go, ... how high up the ladder are you going to go, how much freedom are you going to have? And if you really go all the way up the ladder, all the way, maybe you put in your whole career there, really you are talking about, you're doing it for somebody else when you could be doing it for yourself."

"You want to get in a situation where you are in charge of your own destiny. You can travel when you want, you can have family time when you want, you can make as much or as little money as you want to make."

"You want to partner with a company that has products, that has an opportunity for you, to get into something that's technology-proof, right? And that's the only way you are going to make it. This is not like your grandparent's days of working, where you had a job, you worked a job, you did the whole thing, and then, all of a sudden you retired out of that job."

"What we've done is we've created the system and the products that are technology proof, that allow you to live that life you want."

"You don't want to be stuck in a situation when the boat leaves and you didn't get on board, because this only comes around once, these types of opportunities, they only come around once and if you want to live a

better life, and you want to travel, and you want to have freedom, and you want to be able to take care of your kids, and you want to be able to buy things without worrying about it, then you need to partner and you need to get involved in this opportunity. And it's an opportunity, people are going to make a lot out of it, some people are going to make a little bit out of it, some people are going to make more money in a month than they made in a year. But it's here, and it's simple."

"You build your team, your team of ten equality, you teach them how to build their team of ten equality, you get paid, you get paid, and you get paid. And then you do trips, and then you do it over again, and you do it over again. And your freedom, the bigger your, the bigger that your distribution model gets, the more freedom you have. That's how, that's what it's designed around."

21. In subsequent videos, Mr. Cardiff shares similar messages of frustration with the status quo and the freedom and prosperity available through Rengalife:

(From FB Live Video 03.12.18)

"Nobody is getting a job today that they will be able to retire from. Nobody."

"It's all going to be replaced. Unless you can get in a distributor model with a company that's got an easy pay plan, a lot of travel and the ability for you to make a lot of money."

"The only time you're going to have real freedom and security is when you make it for yourself and you own it and it's yours."

(From FB Live Video 03.14.18)

"You have to ask yourself: 'why am I always in the same situation, over and over and over again and I can't get past it?'"

"But in Rengalife, we show you how to have a better life, how to make more money, have better trips, work for yourself."

"If you like where you're at in life, if you like working for someone else, and being tired, and being stressed out, and not having financial freedom, Rengalife's not for you. I'm serious. But if you want to make a way, and make a difference for yourself, if you want to have an opportunity to get with a Inc. 500 company..., you want to be with a technology-proof product, and you really want to make some serious, serious, lifestyle changes for yourself."

"It's the only way where you're going to be able to get into a business, that's your own, that you can start for very, you know, no money, it's all

set up, and you can be at the top of it and you can grow it as big as you want to get it.”

(From FB Live Video 03.15.18)

“Right now, today, will never come around again.”

“What we are offering at Rengalife and what Rengalife is offering people is not just freedom, of maybe freedom of your job, freedom of having financial challenges, freedom of not being able to go where you want to go, see things you want to see, buy things you want to buy, take care of people you want to take care of, but, what we’ve mastered, and what is inside of the Rengalife system, what we’re going to show people, is how to unlock that freedom...so you can do what you want to do.”

Normal life is like “being in jail, in a circle, just making it day to day.”

“You set your goals, and you decide what kind of life you want, not your employer, where you live, who your parents are or were, who your children are, you decide that, and we give you those tools.”

(From FB Live Video 03.28.18)

“For those of you that like, you know, hey making the living that you’re making, spending two, three hours, two hours a day in the car, working for somebody else, maybe Rengalife isn’t for you, maybe not. But if you’re willing to take a chance, just a small chance, you know what, I bet you it is.”

Distributor Training and Incentivized Purchases

22. In order to achieve the results described above, the Compensation Plan and training videos outline a set of actions that are said to be simple, fast, and fool-proof. You can own a business without having to rent an office, buy equipment, or hire employees (FB Live Video 04.04.18). As Mr. Cardiff explains: “you need to be able to explain Rengalife and how it works in five seconds to people” (FB Live Video 03.14.18) and “this is the simplest way to make money I have ever seen” (FB Live Video 04.04.18). The actions emphasize the importance of two of the five sources of income (discussed in more detail in paragraph 14) – namely, team commissions and advancement bonuses. A new recruit should follow this “simple, honest, and transparent” process (FB Live Video 04.04.18): (1) sign up as an Executive, buying a bundle of products (minimum \$199.80); (2) continue to purchase at least \$199.80 in products each month to maintain qualification for income; (3) recruit ten new Executives who maintain those same purchase levels; and (4) teach those

recruits to duplicate your actions. As Cardiff explains: “Every single person can fast track this system for yourself, and you focus on very, very a very simple plan that we’ve got for you” (FB Live Video 03.14.18). Cardiff continues: “Start thinking about your team. Start looking inside your social media. Looking at, who do you know who wants to get involved in something, who you want to lead and you want to take them with you and you want to change their life.”

23. Mr. Cardiff continues to discuss the simplicity of this system in other training and recruitment videos:

(From FB Live Video 03.15.18)

“What we are going to ask you to do is to follow the proven path of success that I have proven, time and time again, that works. It’ll work, and it’ll make you, it’ll give you freedom, it’ll give you time, it’ll give you whatever you need in order to achieve your goals.”

“I’ve mastered, we’ve mastered this and we teach you how to do it.”

(From FB Live Video 03.26.18)

“I have built a plan that will show you how to immediately get to your first level, almost immediately.”

“Really simple, really easy.”

(From FB Live Video 04.04.18)

“Easiest thing to do is team-building and I’m going to show you how - it’s very, very simple.”

“If I can show you how to spend 30 minutes a day and make an extra \$2,000 a month outside of your regular job, and it could be as big or small as you want, would you do it?” That’s what you’re going to say. Everybody’s going to say yes, everybody.”

“Your job is to introduce Rengalife and the products, which are world class, to ten people. Get ten amazing people.”

24. While Mr. Cardiff states that there is no purchase required (FB Live Video 03.15.18), this is directly refuted by qualification requirements, website language, and his own subsequent instructions (FB Live Video 04.04.18): “I don’t want you to be scared, but you have to pick a package. One of these packages is what qualifies you to be an Executive.” He continues: “If I told you you had to make a little tiny investment in product for yourself to get to the Executive level, if I said ‘Hey, if you spend ... \$199.80, if I showed you how to spend \$199.80 and you could make \$5,000 a month, \$6,000 a month, is that a good investment and you would say “yes, it is, it’s a very good investment.”’ He

continues later in the video: “What do they have to do to become a team member? They have to become an Executive. How do they become an Executive? They buy a package or they spend about \$199.80, just under \$200.” On the Rengalife website, recruits see the following instruction: “In order to get started as an Executive with access to all 5 levels to earn please pick out a bundle package below” (2018.04.17 Rengalife - Distributor Enrollment - Finally a plan you can understand_Rengalife – US – Official Site). As of April 17th, the Distributor sign-up process also included a monthly autoship enrollment, such that orders would be automatically placed and shipped each subsequent month.⁶ Figure 6 provides images of this autoship enrollment process from the company’s website.

25. Figure 7 shows various images where Mr. Cardiff explains the compensation associated with the pay-recruit ten-duplicate process in Rengalife (FB Live Video 04.04.18). Rounding \$199.80 up to \$200, Cardiff describes the income associated with each stage of recruitment. On 1st-level recruits (i.e., the Distributor’s ten direct recruits), the Distributor earns 30% commission on “everything everybody spends as an Executive”, generating $10 * \$200 * 30\% = \600 . Cardiff continues: “I’m going to show you, in couple easy steps, how you can get to \$12,600 a month. And, by the way, at any point in your Rengalife journey, because this is about lifestyle right, at any point if you want to stop working the business, you stop, and you keep collecting, you keep getting your commission checks and it keeps growing.” He continues to explain that, on 2nd-level recruits (i.e., the 100 people recruited by the Distributor’s ten direct recruits) the commission is $100 * \$200 * 10\% = \2000 , for a combined total of \$2600 per month. When the 100 2nd-level individuals get their 10 team members, commissions rise to a combined total of \$12,600 per month ($1000 * \$200 * 5\% + 100 * \$200 * 10\% + 10 * \$200 * 30\%$).

26. Cardiff explains that earnings can grow even larger, since “we don’t stop you at ten” (FB Live Video 04.04.18). He explains: “you train your ten people, all you have to do is introduce, all you have to do is go get ten people, okay” ...

⁶ There have been some recent changes to the company’s website and instructions (FB Live Video 04.25.18) which will be discussed further in the Safeguards section. These changes appear to remove the requirement for the initial product purchase (at time of sign-up) and automatic autoship enrollment. It is difficult to know if additional changes or adjustments will yet be made, as the compensation structure so heavily relies upon these automatic, monthly Distributor purchases.

“engraining it in them, that is all you have to do”... “and now, guess what you get to do, you get to go get another ten people because you decided that \$12,600 isn’t enough”... “doubled the whole experience”... “do it again, and again, and again.” He describes this as the “power of ten.” Note that all funds in these scenarios are derived from Distributor recruitment and monthly minimum purchases by Distributors themselves, with no discussion or numbers associated with sales to external retail customers.

Figure 6: AutoShip Enrollment for New Rengalife Distributors (2018.04.17 Rengalife - Distributor Enrollment - Finally a plan you can understand_Rengalife – US – Official Site)⁷

AutoShip(s) Selected			
AutoShip(s) Selected	Quantity	Next Bill Date	Price
Carcinogen Cleanse Kit-A	1	5/17/2018	\$199.80
CHANGE PACKAGE SELECTION		UPDATE	

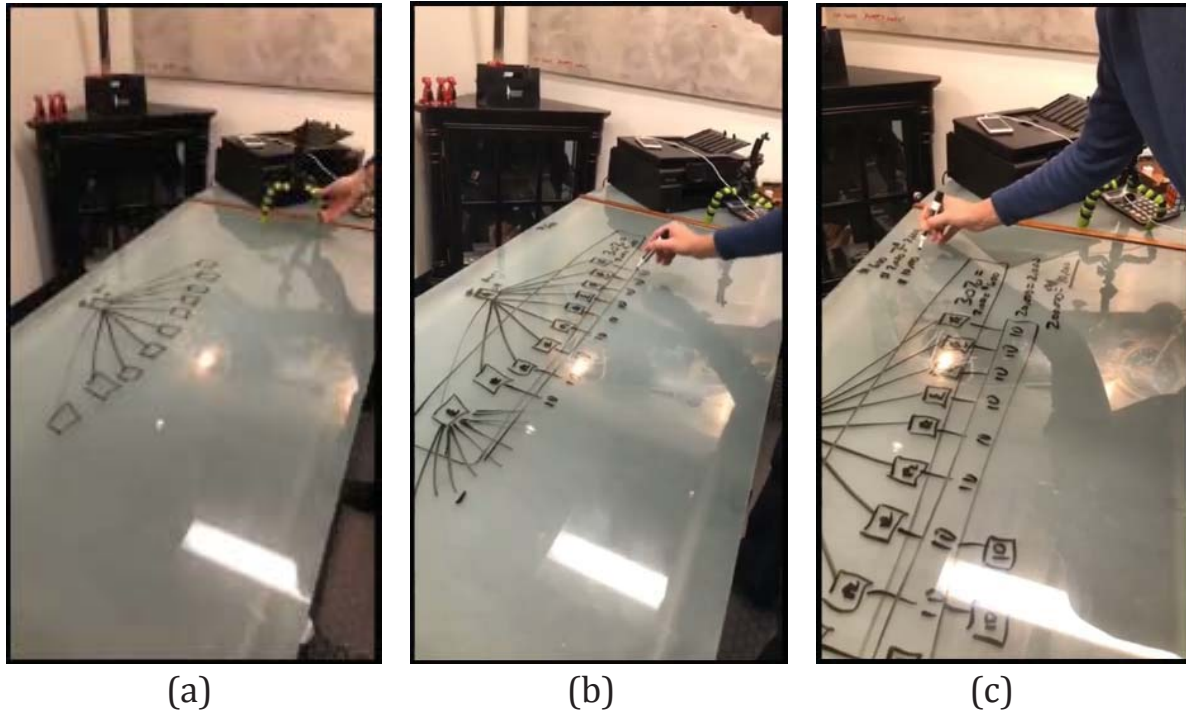
☐ Terms & Conditions: I have read and agree to the Terms and Conditions of this website. Clicking the "Place Order Now" button will submit my order for processing. I may cancel this purchase within 30 days for a full refund by eMailing support@rengalife.com or contacting Customer Service at 800 674 9578

☐ Terms of sale for AutoShip: I have read and agree to the Terms of Sale for AutoShip

☐ Electronic Consent: I have read and agree to the Electronic Consent

⁷ In contrast to the images in Figure 6, autoship is no longer mentioned on the sign-up page, but autoship is still mentioned in the Distributor Agreement, found under “Electronic Consent” (<https://www.rengalife.com/enroll/?step=7>).

Figure 7: Images from Rengalife Recruitment Video (FB Live Video 04.04.18)



27. Mr. Cardiff devotes significant time to the language and process that can be used to recruit new Rengalife Distributors. In one video he describes his “secret” is to introduce Rengalife to four people each day, expecting one of every four will sign up (FB Live Video 04.04.18). Cardiff also uses his purported discussions with his teenage daughter to provide training advice. Figure 8 provides an example where Cardiff mentions his daughter, who he is training to “live the Rengalife,” and Figure 9 provides images from two training videos where he discusses specific advice he has given to his daughter. Cardiff begins by posing the question: “What do I have to do if I want to make \$5,000 a month in 45 days and make \$5,000 a month every month after that.” He continues: “Here’s what you’re going to do. You’re going to sign up, you’re going to become a Rengalife representative. ... Then, we’re going to build your team.” He advises the listener (and his daughter) to keep it simple with new recruits and suggests the following language: “I want to talk about one way to earn, and it’s actually a very important way and if you were willing to try something just for 30, 45 minutes out of your day, I said, I can get you to \$5,000 a month in 45 days, but you have to follow this two-page, two-page plan.” He follows this up with instructions to immediately go out

and get ten people, use social media, make groups, and target 15 people in each group.

28. Cardiff suggests striking up conversations with people who are working but likely aren't making enough money to pay their bills. He further suggests that new Distributors should organize their Facebook, Twitter and Instagram accounts and make groups of the people they know in social media and beyond. Figure 9 includes an image where he discusses potential groups his daughter could tap for recruitment: tennis, school, movies, the mall, her hair salon, sports club, etc. He provides more suggested language for recruitment: "Do you want to see an easy way to make money fast? ... I am in Rengalife, the fastest growing Multiple Stream of Income System in the world." Cardiff continues: "I am in Rengalife. Give me 30 minutes and I will show you, at the age of 14 years old how I'm going to make \$75,000 this year. Okay. I'm going to make \$75,000 this year. Do you want to make 75,000 extra dollars this year?" Cardiff explains that you then train them to focus on fast recruitment: "Every person that says they want to be on your team, you have to tell them they must get, they must get 10 people on their team in 15 days. ... If you get 10 people in 15 days, you're gonna hit your numbers, guaranteed. It's guaranteed because it's the way we built the system." Figure 8 images match Cardiff's advice, with "Do you want to see an easy way to make money fast," "get 10 people in 15 days," and "14 years I will make \$75,000."

Figure 8: Rengalife Promotion (2018.04.03 My 14-yr old is living the Rengalife)

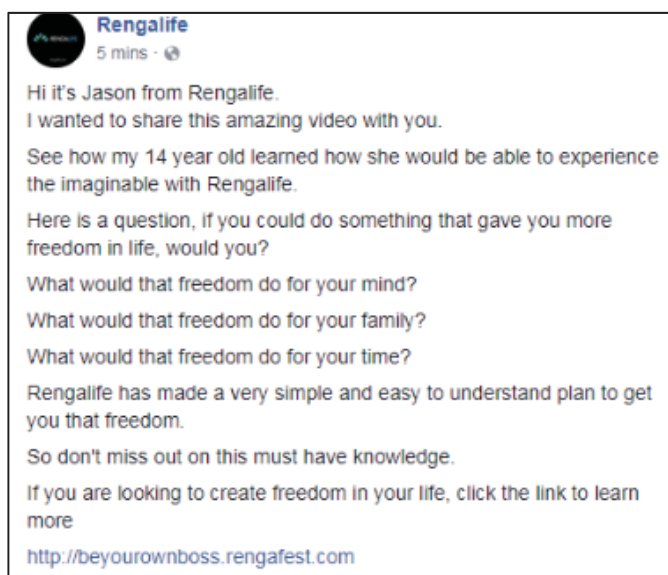
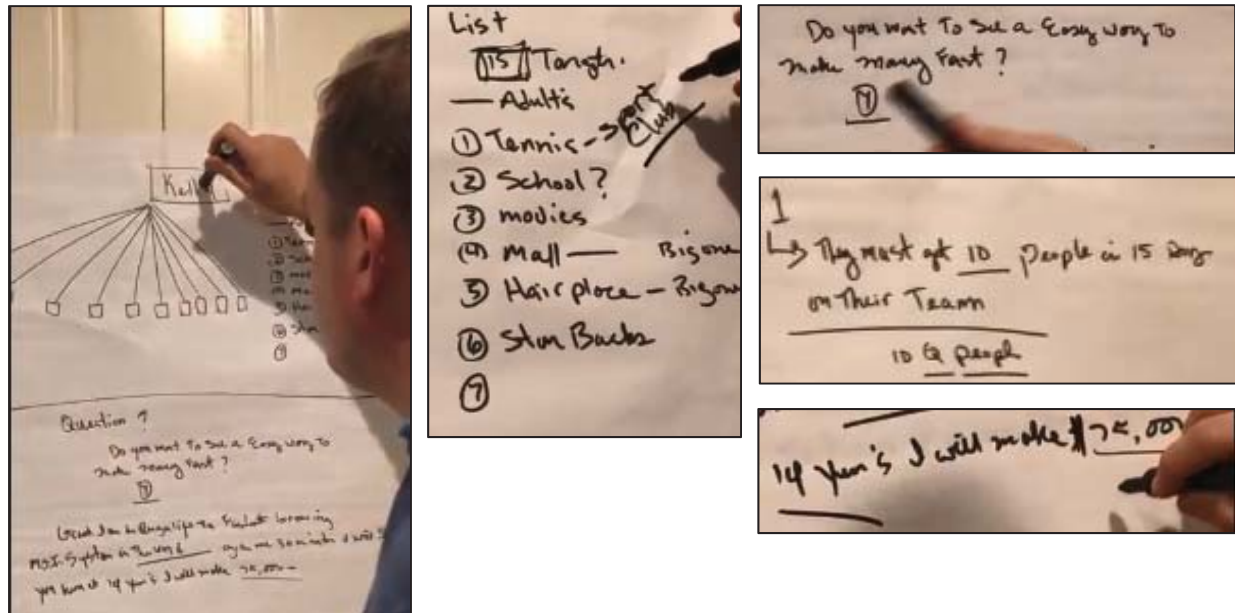


Figure 9: Images from Training Videos (from https://www.youtube.com/watch?v=i_F9e1o5t8g and <https://www.youtube.com/watch?v=Dd0rGZhMf5o>)



29. Mr. Cardiff never includes retail profits in the income scenarios, projections, or training instructions. When listing all five ways to earn, Cardiff does refer to the 20% commission that can be earned if a Distributor sells product at the full retail value to an external Customer, but always emphasizes the role of “team commissions” above all else. At one point, he mentions the 20% commission but then adds, “but just on the team level it can work” (FB Live Video 04.04.18). In that same April 4th video, Cardiff suggests that the recruitment-oriented approach is a safe way to earn money, mentioning that Wall Street and capital markets love distribution models like this because they are “very safe, not just for the members, but for the company, and for everybody.”

Compensation Plan Analysis and Income Representations

30. I find that Rengalife and its co-founder, Jason Cardiff, utilize false or unsubstantiated earnings claims to recruit participants into the Rengalife marketing program. Not only does the company make claims regarding

lifestyle and earnings that will not be realized by the majority of participants, it suggests these outcomes are guaranteed. Furthermore, given that the design of the Rengalife marketing program and corresponding training is focused on a pay-recruit ten-duplicate model, the Rengalife program is structured as an endless chain recruitment structure. Therefore, the Rengalife earnings claims are false as the program, by design, will deliver losses to the vast majority of participants (as discussed in paragraphs 7-9).

31. Table 2 provides an example of the recruitment progression that follows from Rengalife's incentive structure and Mr. Cardiff's instructions. This illustration closely follows Mr. Cardiff's advice to become an Executive, meet monthly purchase minimums, recruit ten additional Executives quickly (Cardiff advises to meet this goal within the first 15 days, as described in paragraph 28), and train those new recruits to duplicate those exact actions. The results demonstrate the underlying fallacy of Rengalife earnings claims. With a recruitment factor of ten, the Distributor organization grows exponentially at such a significant pace as to exceed the population of the U.S. in month ten and the population of the world in the following month. By assuming that one can find ten recruits within one month, losses are contained to those who have just been recruited, but that group quickly constitutes 90% of participants as shown in the last column of Table 2. Losses would be even higher if it takes multiple months to achieve the needed recruitment to cover the personal investment (e.g., converging to 99% if those in the lowest two levels are in a loss position).⁸ This will almost certainly be the case, especially as participation grows and recruitment becomes increasingly more difficult.

⁸ Note that only four Executive recruits are needed to cover one's personal investment, given that $\$199.80 \times 4 \times 30\% = \239.76 , but the outcome of a recruit-four structure would be no different (i.e., the vast majority would be left in a loss position), only that theoretical loss rates would be somewhat lower.

Table 2: Rengalife Compensation Scenario and Downline Structure

Founder							Founder and His/Her Downline		
Month	New Downline Distributors	Cumulative Downline Distributors	Team Commissions (PTC)	Advancement Bonus (PTM)	Personal Expenditure	Net Profit in Pay Period	Cumulative Net Profit	Number in Loss Position	Percent in Loss Position
1	-	-	\$0.00	\$0	\$199.80	-\$199.80	-\$199.80	1	100.000%
2	10	10	\$599.40	\$500	\$199.80	\$899.60	\$699.80	10	90.909%
3	100	110	\$2,597.40	\$1,200	\$199.80	\$3,597.60	\$4,297.40	100	90.090%
4	1,000	1,110	\$12,587.40	\$10,000	\$199.80	\$22,387.60	\$26,685.00	1,000	90.009%
5	10,000	11,110	\$12,587.40	\$0	\$199.80	\$12,387.60	\$39,072.60	10,000	90.001%
6	100,000	111,110	\$12,587.40	\$0	\$199.80	\$12,387.60	\$51,460.20	100,000	90.000%
7	1,000,000	1,111,110	\$12,587.40	\$0	\$199.80	\$12,387.60	\$63,847.80	1,000,000	90.000%
8	10,000,000	11,111,110	\$12,587.40	\$0	\$199.80	\$12,387.60	\$76,235.40	10,000,000	90.000%
9	100,000,000	111,111,110	\$12,587.40	\$0	\$199.80	\$12,387.60	\$88,623.00	100,000,000	90.000%
10	1,000,000,000	1,111,111,110	\$12,587.40	\$0	\$199.80	\$12,387.60	\$101,010.60	1,000,000,000	90.000%
11	10,000,000,000	11,111,111,110	\$12,587.40	\$0	\$199.80	\$12,387.60	\$113,398.20	10,000,000,000	90.000%
12	100,000,000,000	111,111,111,110	\$12,587.40	\$0	\$199.80	\$12,387.60	\$125,785.80	100,000,000,000	90.000%
\$2,397.60							\$125,785.80		

Assumptions:

- An individual joins Rengalife in Month 1 (described as "Founder") and brings in ten frontline (direct) recruits in the subsequent month.
- Each new Distributor recruits ten frontline recruits in the month following the join month and does not recruit any additional frontline recruits.
- Each Distributor maintains \$199.80 in product purchases each month.
- No expenses are included beyond product purchases.
- Advancement Bonuses are paid in period of qualification.
- No new product bonuses, trip incentives, retail sales, sales taxes, or shipping and handling are included.

32. Given the design of the Rengalife system and the prescribed Distributor behavior, it is possible that some participants will profit, especially with early entry, but only at the expense of other participants. Mr. Cardiff speaks to this eventuality to incentivize early participation and build excitement. Near the company's launch date (FB Live Video 03.10.18-2), Cardiff states: "If you want freedom, you want to make a little money, a lot of money, a whole lot of money, I know there's a couple people tonight that I spoke to that called in because the server crashed. They're going to make more money in their first, I don't know, three, four months than they've made in the last five years." About two weeks later (FB Live Video 03.26.18), Cardiff claims: "I know that there's people that are going to make more money, more money, more reoccurring revenue this year through Rengalife then maybe they made all of the last ten years." Mr. Cardiff speaks directly to the profit of early entry in a video a month later (FB Live Video 04.25.18): "The people who get in on the ground floor are the ones who will make all the money." Beyond claims of early income-generation, upcoming events (with destinations including Las Vegas and Paris) are advertised to promote entry and create the impression of company longevity and success. Figure 10 provides an example of Rengalife event promotion.

Figure 10: Rengalife Event Promotion (upcoming events (trips))

5 OCTOBER, 2018	RENGAFEST Wynn Hotel, 3131 South Las Vegas Blvd., Las Vegas, NV 89109, United States
7 JANUARY, 2019	RENGA SNOW & WINTER FEST Stein Erickson Lodge, 7700 Stein Way, Park City, UT 84060, United States
3 MARCH, 2019	RENGA EUROPE Four Seasons Hotel George V, 31 Avenue George V 75008, Paris, IL France

Safeguards

33. Having found that Rengalife's program is effectively an endless recruitment chain that misrepresents income potential and delivers losses to the majority of participants, it is necessary to address Rengalife policies that might appear to be "safeguards" against such harm. Such safeguards are necessary, as an MLM structure with insufficient retail sales will inevitably generate a pyramid scheme that relies on ongoing recruitment to fund commission payments, matching the general economic characterization of a scheme described in paragraphs 7-9. These safeguards must be stated, enforced, and effective. I proceed by discussing Rengalife's policies that might be perceived as safeguards.

34. As part of the sign-up process, new Distributors agree to the Rengalife Terms & Conditions, Distributor Agreement, and Policies & Procedures. Within the Terms & Conditions document, there are multiple statements (shown in Figure 11) that appear to promote and require retail sales based on genuine demand for Rengalife products, but those statements directly contradict the company's own incentive structure and training described above. Specifically, the Terms & Conditions state that no compensation is based on the recruitment of new Distributors, yet Rengalife earnings claims are based almost exclusively on Distributor purchases (not sales to Customers) and advancement is driven by the number of recruited Distributors. Distributors agree not to make claims regarding income potential, yet the company's website and co-founder consistently use income and lifestyle claims in recruitment and training. The Terms & Conditions state that half of Distributor's wholesale purchases must be resold to customers who are not also Rengalife Distributors, yet this is never mentioned within the Compensation Plan or in Distributor recruitment or training materials. There is no evidence that this rule is enforced or effective. Furthermore, Distributors agree not to purchase products solely for the purpose of payment or advancement, yet that is precisely what they are required and instructed to do. As described above, Cardiff explicitly trains recruits to make an initial purchase, maintain monthly minimum purchases, recruit ten people, and train them to duplicate these actions. The Compensation Plan itself, depicted in Figure 4, clearly prescribes these buy and recruit behaviors. The refund policy is ineffective if Distributor purchases are incentivized by participation in the pay plan and reinforced by Rengalife training and promotion materials.

35. The Terms & Conditions document also states that the company does not charge a fee or require an initial product purchase to be a Distributor. This is also contradicted by the company's practices, as discussed in paragraph 24. The recent change to eliminate the buy-in requirement (announced in FB Live Video 04.25.18) may be motivated by concerns regarding regulatory exposure or a desire to reduce the entry barrier for new recruits. In announcing the change in policy, where new Executives no longer need to make an initial \$199.80 purchase, Mr. Cardiff states: "You don't have to purchase anything. You probably should but, you should probably buy some products to understand them." He goes on to say that you can still build your team and receive 30% commission on your 1st-level team, 10% on the 2nd-level, and 5% on the 3rd-level recruits. It may be that newly recruited Executives will no longer need to pay \$199.80 at the time of joining but would still need to maintain \$199.80 in product purchases per month to be eligible to earn income, thereby generating commissionable volume. However, as of May 16, 2018, the sign-up process for Executives still states: "In order to get started as an Executive with access to all 5 levels to earn please pick out a bundle package below," contradicting the April 25th video announcement. Junior Executive (which has no entry fee but limited income potential, discussed in paragraph 13) does not appear as an option under "Join Now."

Figure 11: Excerpts from Rengalife Terms & Conditions
(<https://www.rengalife.com/enroll/?step=7>)

Independent Sales Representative AGREES:

3. Independent Sales Representative understands that he/she is not compensated for sponsoring other Independent Sales Representatives but earns compensation solely on sale of products and/or services to ultimate consumers.

9. Independent Sales Representative will make no claims as to income potential either written or oral except those prepared by the company for illustration purposes only.

14. I understand that at least 50% of all of Distributor's wholesale purchases must be resold to customers that are not Independent Sales Representatives of Company and that I will not purchase products solely for qualification for a higher position, bonus or commissions.

15. All product(s) in *resalable condition* purchased within 90 days prior to termination may be returned (shipping prepaid). Company will repurchase such products at 90% of original price less any bonus or commissions paid. All current sales aids and in *resalable condition* purchased within 90 days prior to terminating may be returned (shipping prepaid). Company will purchase such materials at 90% of original price. Any laws in any jurisdiction inconsistent herewith are adopted herein and will be followed.

rengalife AGREES:

6. Company does not require Independent Sales Representative to sponsor and does not require any fee, charge or initial product purchase to be a Independent Sales Representative.

36. The Policies & Procedures document has many of the same statements as in the Terms & Conditions document. Figure 12 provides relevant excerpts. Beyond those already discussed within Terms & Conditions, the Policies & Procedures document requires Distributors to provide a “Retail Sales Slip” to all retail customers and copies of those slips should be saved and made available to the company upon request. The Retail Sales Rule itself does not require a minimum number of retail sales or customers. The “Over 70% Rule” states that over seventy percent of products (in dollar terms) must be sold to non-Distributors in order to be eligible for Rengalife commissions and overrides. As with the 50% requirement in the Terms & Conditions document, there is no mention of this policy in any other materials or video and there is no evidence that policy compliance is encouraged, monitored or enforced. Note also that a Distributor that satisfies the 50% requirement (statement 14 in Terms & Conditions) could easily be in violation of the Over 70% Rule, making these policies confusing and potentially in conflict with one another.

Figure 12: Excerpts from Rengalife Policies & Procedures
(<https://www.rengalife.com/Public-Policies-and-Procedures/>)

1.02 NO FEE, CHARGE OR PURCHASE REQUIRED

No initial fee, charge or purchase is required to become a Independent Sales Representative.

3.04 INCOME CLAIMS

Independent Sales Representatives must truthfully and fairly describe the Compensation Plan. No past, potential or actual income claims may be made to prospective Independent Sales Representatives, nor may Independent Sales Representatives use their own incomes as indications of the success assured to others. Commission checks may not be used as marketing materials. Independent Sales Representatives may not guarantee commissions or estimate expenses to prospects.

8.01 BASIS FOR COMMISSIONS

Commissions and other compensation cannot be paid until a completed Agreement has been received and accepted by Company. Commissions are paid ONLY on the sale of Company services and products. No commissions are paid on the purchase of Sales materials or for Sponsoring Independent Sales Representatives. In order to receive commissions on products and services sold, Company must have received and accepted an Agreement prior to the end of the commission period in which the sale is made.

9.01 STOCKPILING PROHIBITED

The success of Company depends on retail sales to the ultimate consumer; therefore all forms of stockpiling are prohibited. Company recognizes that Independent Sales Representatives may wish to purchase certain products for their own use. However, Company strictly prohibits the purchase of products in unreasonable amounts and prohibits the purchase of products only or primarily to qualify for compensation.

9.02 RETAIL SALES RULES

Independent Sales Representatives must save a copy of the Retail Sales Slip given to retail customers; receipt shall be fully completed and include the name, address and phone number of each retail customer and, upon request by Company, provide copies of such receipts to Company. If Company determines that retail sales were not actually made, the Independent Sales Representative must repay Company all commissions earned during the calendar period in which the retail sales were to have been made.

9.03 OVER 70% RULE

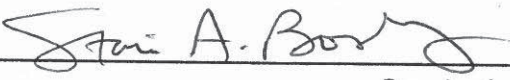
In order to receive commissions and overrides, Independent Sales Representatives must certify on each product order form that they have sold over seventy percent (70%) in dollar value of all products and commissionable services previously purchased by the Independent Sales Representative at wholesale from the company, to Non-Independent Sales Representative consumers. Independent Sales Representatives shall maintain retail sales records available to the company for inspection on request.

Conclusions

37. In sum, after reviewing the Rengalife incentive structure, promotion and training materials, representations, terms, conditions and policies, I conclude that Rengalife and its promoters are marketing a fraudulent scheme.

Distributor compensation is driven almost exclusively by recruitment of new participants and compelled product purchases. Training and promotion materials emphasize the pay-recruit-duplicate system. Company "safeguards" appear insufficient to ensure a minimum level of retail activity and safeguard policies are systematically contradicted by Rengalife incentives, requirements, and training. The anticipated result of Rengalife's program is an endless recruitment chain. Rengalife's income representations are false as the suggested (even promised) income levels cannot be achieved by the vast majority of participants. At any moment that the scheme is analyzed, the overwhelming majority are expected to be in a loss position. Consumers are misled into joining the Rengalife opportunity and, for those who participate, consumer harm will be widespread and inevitable.

38. I understand that this report may be used in a law enforcement proceeding. Pursuant to 28 USC Section 1746, I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge and belief.



Stacie A. Bosley

Date: 9/21/2018

Appendix A – Curriculum Vitae

STACIE A. BOSLEY

Associate Professor of Economics
Hamline University
Saint Paul, Minnesota

sbosley@hamline.edu
651-523-2436

EDUCATION

Ph.D. in Applied Economics – University of Minnesota (2001)
BBA in Finance – University of Wisconsin-Madison (1994)

ACADEMIC EXPERIENCE

Hamline University: Associate Professor, Economics (2017-present)
University of Minnesota: Visiting Scholar (2017-2018)
Hamline University: Assistant Professor, Economics (2011-2017)
Hamline University: Visiting Assistant Professor and Adjunct Instructor
(2002-2011)
Macalester College: Visiting Assistant Professor (2003-2005)
University of Wisconsin River Falls: Adjunct Professor (1999-2000)

COURSES TAUGHT

Microeconomic Principles, Intermediate Microeconomics, Behavioral &
Experimental Economics, Labor Economics, Introduction to Business
Analytics, First Year Seminars (“Our Wal-Mart World,” “Are You
‘Predictably Irrational?’” and “Your Life Through Data”), Macroeconomic
Principles, Intermediate Macroeconomics, Managerial Economics
(undergraduate and MBA), and Statistics

HONORS AND AWARDS

Hamline School of Business Dean’s Leadership Award (2017)
Hamline School of Business Dean’s Teaching Award (2017)
Hamline Center for Justice and Law Grant (\$2,500) – Project: Judgment
and Decision-Making in a Pyramid Scheme Experiment: Lessons
for Active Consumer Education (2017)
Nominee for CASE U.S. Professor of the Year Award (2015)
Hamline University Faculty Advisor of the Year (2013)
Dean’s Leadership Award (2013)
Hamline Oracle (student newspaper): Named in Top 10 Hamline
Professors (2010)
Inducted as Faculty Member in Omicron Delta Kappa (2008)
University of Minnesota Doctoral Dissertation Fellow (2000-2001)
USDA National Needs Doctoral Fellow (1997-2000)

- COLLABORATIVE RESEARCH** (competitive research program with undergraduate students)
- Informing a Pyramid Scheme Experiment: Exploring the Role of Impulsivity and Cognitive Processing in Judgment and Decision-Making
 - Joining a Pyramid Scheme: The Influence of Risk Preferences in Decision Making
 - Affinity Fraud in Multilevel Marketing: The case of Fortune Hi-Tech Marketing in the U.S.
 - Direct Selling and Economic Growth
 - Bitcoin, Behavioral Economics, and the Austrian School
 - The Minimum Wage and Community College Enrollment in the U.S.
 - Why Here and Not There? A look at participation and growth in direct selling across countries
 - Implications of Light Rail Transit in Minnesota
 - College Greek Participation and Long-term Outcomes
 - Division III Intercollegiate Athletics and Enrollment
 - The Conservation Reserve Program and Hunting Expenditures in Minnesota
- PRESENTATIONS**
- Bosley, S. (2017). Decision-Making and Vulnerability in Pyramid Scheme Fraud. Paper presented at the annual meeting of the Southern Economic Association, Tampa, FL.
 - Bosley, S. (2017). Judgment and Decision-Making in a Pyramid Scheme Experiment. Presented at the Agricultural and Applied Economics Research Seminar at the University of Minnesota.
 - Bosley, S. (2016). Global Direct Selling: Do Values and Attitudes Trump Economic Conditions. Paper presented at the annual meeting of the Southern Economic Association, Washington D.C.
 - Bosley, S. & Knorr, M. (2016). How is a Pyramid Scheme like the Ku Klux Klan? Presented at the Saint Olaf Economics Lecture Series, Northfield, MN.
 - Bosley, S. & Knorr, M. (2016). How is a Pyramid Scheme like the Ku Klux Klan? Presented at the Hamline Faculty Research Colloquium, Saint Paul, MN.
 - Bosley, S. (2016). Business Opportunity or Scam: What every college student should know. Presentation to the Hamline Student Body (connected with First Year Seminar program), Saint Paul, MN.
 - Bosley, S. (2016). Pyramid Scheme Membership in Networks: The Role of Affinity, Education and Economic Conditions. Paper presented at the annual meeting of the Eastern Economic Association, Washington D.C.
 - Bosley, S. (2016). How is a Pyramid Scheme like the Ku Klux Klan? Presented at the Hamline School of Business Faculty Research Forum, Saint Paul, MN.
 - Bosley, S. (2015). Business Opportunity or Scam: What every college student should know. Presentation to the Hamline Student Body (connected with First Year Seminar program), Saint Paul, MN.

- Bosley, S. (2015). Network Analysis of a Pyramid Scheme. Paper presented at the annual meeting of the Midwest Economics Association, Minneapolis, MN.
- Bosley, S. (2015). Network Analysis of a Pyramid Scheme. Paper presented at the Hamline School of Business Faculty Research Forum, Saint Paul, MN.
- Bosley, S. (2015). Business Opportunities ("Biz Opps") on College Campuses. Presentation to the Hamline ODK Student Chapter, Saint Paul, MN.
- Bosley, S. (2015). Business Opportunities ("Biz Opps") on College Campuses. Presentation to the Hamline University Student Congress, Saint Paul, MN.
- Bosley, S. (2014). Learning through Experimentation: Creating an Authentic Experiment with Behavioral Economics Students. Paper presented at the annual meeting of the Western Economic Association, Denver, Co.
- Bosley, S. (2014). Creating Custom Student-Driven Experiments in Behavioral Economics: The Simulation of a Pyramid Scheme. Paper presented at the Hamline School of Business Faculty Research Forum, Saint Paul, MN.
- Bosley, S. (2013). Participation and Growth in Direct Selling across Countries. Paper presented at the Southern Economic Association Conference, Tampa, FL.
- Bosley, S. (2013). The Virality of a Pyramid Scheme. Paper presented at the Eastern Economic Association Conference, New York, NY.
- Bosley, S. (2013). The Virality of a Pyramid Scheme. Paper presented at the Hamline School of Business Faculty Research Forum, Saint Paul, MN.
- Bosley, S. (2013). Program Assessment: Process and Progress in the Hamline School of Business. Presented to the Hamline University School of Education, Saint Paul, MN.
- Bosley, S. (2013). Program Assessment. Presented at the Faculty Development Day, Saint Paul, MN.
- Bosley, S. (2012). Labor Supply and Pyramid Schemes: Evidence from a State Settlement. Paper presented at the Eastern Economic Association Conference, Boston, MA.
- Bosley, S. (2012). Labor Supply and Pyramid Schemes: Evidence from a State Settlement. Paper presented at the Hamline School of Business Faculty Research Forum, Saint Paul, MN.
- Bosley, S. (2011). Multilevel Marketing: Liberation or Entrapment. Presented at the National Women's Studies Association 2011 Conference, Atlanta, GA.
- Bosley, S. (2011). Labor Participation in Multilevel Marketing: Is it a Counter-cyclical Industry? Paper presented at Eastern Economic Association Conference, New York, NY.

- Bosley, S. (2011). Labor Participation in Multilevel Marketing: Is it a Counter-cyclical Industry? Paper presented at the Annual Conference of the Society for Advancement of Behavioral Economics, San Diego, CA.
- Bosley, S. (2004). Dead-End Jobs or Stepping Stones? The Long-Run Consequences of Early Industry and Occupation. Paper presented at the Annual Meeting of the Midwest Economics Association, Chicago, IL.
- Bosley, S., Keil J. & Aziz F. (2003). Innovative Pedagogy in the Economics Major: Interactive Learning Techniques That Build Critical Basic Skills. Presented at the Collaboration Faculty Development Conference, Bloomington, MN.
- Bosley, S. (2003). Employment Mobility Among Less-Skilled Women and Men – Are There Long-Run Consequences? Paper presented at the Annual Meeting of the Illinois Economics Association, Chicago, IL.
- Bosley, S. (2001). Complex Job Mobility and Long-Run Outcomes for the ‘Economically At-Risk. Paper presented at the Annual Meeting of the Midwest Economics Association, Cleveland, OH.
- Bosley, S. (2000). The Employment Stability of Less-Skilled Rural Workers. Paper presented at the Annual Meeting of the American Agricultural Economics Association, Tampa, FL.
- Ben-Ner, A., Kong F. & Bosley, S. (1998). Workplace Organization and Human Resources Practices: The Retail Food Industry. Paper presented at the Wharton “Understanding the Service Workplace” Conference, Philadelphia, PA.
- King, R., Ashman S. & Bosley S. (1998). Store-Level Innovation in the Retail Food Industry: The ECR Initiative and Beyond. Paper presented at the Sixth Joint Conference on Food, Agriculture and the Environment. Minneapolis, MN.

**PAPERS/
PUBLICATIONS**

- Bosley, S., Greenman, S. and Snyder, S. (2018). Voluntary Disclosure and Earnings Expectations in Multilevel Marketing. Working Paper, currently under review.
- Bosley, S., Bellemare, M., Umwali, L., and York, J. (2018). Decision-Making and Vulnerability in a Pyramid Scheme Fraud. Working Paper, currently under review.
- Bosley, S. and Knorr M. (2018). Pyramids, Ponzis, and Fraud Prevention: Lessons from a Case Study. *Journal of Financial Crime*, 25(1), 81-94.
- Bosley, S. (2017). Expert Witness Report in *Aboltin v. Jeunesse LLC, et al.*, Case No. 6:17-cv-1624-Orl-40KRS, in United States District Court for the Southern District of Florida.
- Bosley, S. (September 29, 2017). Flawed Anti-Pyramid Act Reflects Confusion Over Past and Present. *Morning Consult*. Available at <https://morningconsult.com/opinions/flawed-anti-pyramid-act-reflects-confusion-past-present/>.

- Bosley, S. (March 27, 2017). What social media can teach us about consumer protection. Invited Guest Blog, *Truth in Advertising*. Available at <https://www.truthinadvertising.org/ncpw-social-media-can-teach-us-consumer-protection/>.
- Bosley, S. (2016). Student-crafted experiments “from the ground up.” *The International Review of Economic Education*, 22, 1-7.
- Bosley, S. (2015). Expert Witness Declaration in *FTC v. Vemma Nutrition Company*, Case 2:15-cv-01578-JJT.
- Bosley, S. & McKeage K. (2015). Multilevel Marketing Diffusion and the Risk of Pyramid Scheme Activity: The Case of Fortune Hi-Tech Marketing in Montana. *Journal of Public Policy & Marketing*, 34(1), 84-102.
- Bosley, S. (2013). Comments Regarding the Federal Trade Commission’s Rule Concerning Cooling-Off Period for Sales Made at Homes or at Certain Other Locations, Project Number P087109.
- Bosley, S. (2013). Participation in Direct Selling Across Countries: Analysis and Implications. Working Paper.
- Davis, E., & Bosley S. (2007). The Impact of the 1990s Economic Boom on Less-Educated Workers in Rural America: Did the Rising Tide Lift All Boats? *Journal of the Community Development Society*, 38(1), 59-73.
- Bosley, S. (2004). Dead-End Jobs or Stepping Stones? The Long-Run Consequences of Early Industry and Occupation. Working Paper 04-03. The Retail Food Industry Center, University of Minnesota.
- Bosley, S. (2001). Complex Job Mobility and Long-Run Outcomes for the ‘Economically At-Risk’. Ph.D. Dissertation, Department of Applied Economics, University of Minnesota.
- Honadle, B.W., Honadle G., Bosley S. & Currie E. (2000). Redefining Local Government Roles in Public Services: A Research-Informed Process Model. *Public Management*, 2(4), 457-475.
- Ben-Ner, A., Kong F., and Bosley S. (1999). Workplace Organization and Human Resources Practices: The Retail Food Industry. Working Paper 00-01. The Retail Food Industry Center, University of Minnesota.

SELECT PRESS

- “Pyramid Dream: Multi-level marketing companies evolve with the 21st century,” *Baltimore Magazine*, June 12, 2018 by Lauren Bell.
- “Hard to pin down, scammers flourish in Minnesota,” *Star Tribune*, September 10, 2017 by Kevin Giles.
- “Why do so many women love LuLaRoe?” *Pacific Standard*, December 15, 2016 by Francie Diep.
- Guest on News and Views with Roshini Rajkumar, *WCCO Radio*, discussing holiday-themed pyramid schemes, December 2016.
- “The Divine Rise of Multilevel Marketing,” *Christianity Today*, November 23, 2015 by Kate Shellnutt.
- “MLMs Tap College Campuses for Recruits,” *TruthinAdvertising.org*, August 20, 2015.
- Guest on AirTalk with Larry Mantel, *Southern California Public Radio*

"Tweens get into the direct sales market," June 19, 2014.
"The Avon Lady always rings twice: direct sales, MLM's, pyramid schemes and the wisdom to know the difference," January 15, 2013.
"Money between friends: Silicon Valley's embrace of Multilevel Marketing," *Pacific Standard*, September 19, 2014 by Helaine Olen.
"Has your college student been recruited by a questionable MLM?" *TruthinAdvertising.org*, August 26, 2014.
"ZeekRewards scam leaves N.C. town millions poorer," *USA Today*, March 30, 2013 by Mitch Weiss.
"Federal, state regulators shut down Fortune Hi-Tech," *USA Today*, January 28, 2013 by Jayne O'Donnell.

**SELECT
SERVICE**

Faculty Advisor at Midwest Undergraduate Data Analytics Competition (April 2017)
School of Business - Business Analytics Advisory Board (2016-present)
School of Business Strategic Plan Design Team (2015-2016)
School of Business Undergraduate Curriculum & Assessment Committee (2011-present)
Hamline Committee on Learning Outcomes and Assessment Member (2011-present)
Hamline University Institutional Review Board (2010-2017)
Search Committee Member for Strategic Management and Digital Media Arts (2015, 2016)
Hamline University Standing Committee on Sustainability Member (2014-2016)
Hamline University Assessment Director (2013-2015)
Hamline University Student Progress Committee (2012-2013)
Hamline Plan Revision Taskforce Chair (2012-2013)

**OTHER
EXPERIENCE**

Hamline Center for Justice and Law – Associated Faculty (2016-present)
Minnesota Economic Association President-Elect (2017)
Minnesota Economic Association Board Member (2016-2017)
Expert Witness in *Aboltin v. Jeunesse LLC, et al* (2017-present)
Expert Witness in *FTC v. Vemma Nutrition Company* (2015-2016)
Article Referee for the following journals: *Annals of Public and Cooperative Economics*, *International Review of Economics Education*, *International Journal of Pluralism and Economics Education*, *Journal of Global Marketing*, and *Communications in Nonlinear Science and Numerical Simulation*
Consultant and Systems Analyst for Accenture (1994-1997)

Appendix B – Materials Reviewed

Title	Type
Website 2018.04.19 – Company	PDF
Website 2018.04.19 – Contact Us	PDF
Website 2018.04.19 – Events	PDF
Website 2018.04.19 – Philanthropy	PDF
Website 2018.04.19 – Terms and Conditions	PDF
Website 2018.04.19 – Join Now	PDF
Website 2018.04.19 – Find A Distributor	PDF
Website 2018.04.19 – Get Started	PDF
Website 2018.04.19 – Lifestyle Rewards	PDF
Website 2018.04.19 – Financial Rewards	Video
Website 2018.04.19 – Homepage	Video
Website 2018.04.19 – Products_Introduction	PDF
Website 2018.04.19 – Featured Product	PDF
Website 2018.04.19 – Shop_Buy Now	PDF
Choose Customer Type (http://www.rengalife.com/choosecustomertype/)	From website as of 5/8/18
Electronic Consent (https://www.rengalife.com/enroll/?step=7)	From website as of 5/8/18
Distributor Agreement (https://www.rengalife.com/enroll/?step=7)	From website as of 5/8/18
Policies and Procedures (https://www.rengalife.com/Public-Policies-and-Procedures/)	From website as of 5/8/18
How to grow with Rengalife (https://www.youtube.com/watch?v=i_F9e1o5t8g)	Video
Simple. Honest. Transparent (https://www.youtube.com/watch?v=Dd0rGZhMf5o)	Video
Rengalife – New Levels (https://www.youtube.com/watch?v=DwaAZ6EBG30)	Video
Rengalife intro (https://www.youtube.com/watch?v=Nl1TXIgZv8g)	Video

Rengalife – 5 Ways to Earn (https://www.youtube.com/watch?v=nJBCwGfK810)	Video
FB Live Videos 03.09.18	Video
FB Live Videos 03.10.18	Video
FB Live Videos 03.10.18-2	Video
FB Live Videos 03.12.18	Video
FB Live Videos 03.14.18	Video
FB Live Videos 03.15.18	Video
FB Live Videos 03.21.18	Video
FB Live Videos 03.21.18-2	Video
FB Live Videos 03.21.18-3	Video
FB Live Videos 03.23.18	Video
FB Live Videos 03.26.18	Video
FB Live Videos 03.28.18	Video
FB Live Videos 03.31.18	Video
FB Live Videos 04.04.18	Video
FB Live Videos 04.11.18	Video
FB Live Videos 04.25.18	Video
\$5000 a month in 45 days	PNG Image
2018.03.08 FB Post	PNG Image
2018.03.19 Our Story FB	PNG Image
2018.04.03 My 14-yr old is living the Rengalife	PNG Image
Business without the start-up pains	PNG Image
Instagram Homepage	PNG Image
Multi-product Bundles	PNG Image
Rengalife Benefits	PNG Image
Travel 1	PNG Image
Travel 2	PNG Image
upcoming events (trips)	PNG Image
rengalife - Introduction – Finally a plan you can understand Rengalife - US -	PDF
2018.04.17 Rengalife - Distributor Enrollment - Finally a plan you can understand_Rengalife – US – Official Site	PDF
Events	PDF
Oct 5-7 Event Agenda at Wynn Casino	PDF